

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

<b>In re:</b>  <b>Keith B. Thomas</b> Debtor <b>Shirvell M. Thomas</b> Joint Debtor  <b>NewRez LLC d/b/a Shellpoint Mortgage Servicing</b> Movant <b>v.</b> <b>Keith B. Thomas</b> <b>Shirvell M. Thomas</b> Debtor/Respondent  <b>WILLIAM C. MILLER, Esquire</b> Trustee/Respondent	<b>Bankruptcy No. 16-10651-elf</b>  <b>Chapter 13</b>  <b>Hearing Date: January 28, 2020</b> <b>Hearing Time: 9:30am</b> <b>Location: Courtroom 1, 900 Market</b> <b>Street, Suite 400</b> <b>Philadelphia, PA 19107</b>
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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

NewRez LLC d/b/a Shellpoint Mortgage Servicing has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1) with respect to the Property located at **4717 Osage Ave, Philadelphia, PA 19143-1814** and for such other and further relief as to the Court may deem just and proper.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the motion, then on or before **January 21, 2020**, you or your attorney must filed a response to the Motion. (*see Instructions on next page*).

(a) File an answer explaining your position at:

Robert N.C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

(b) Mail a copy to the movant's attorney:

Harold Kaplan, Esquire.  
10700 Abbott's Bridge Rd., Suite 170  
Duluth, GA 30097  
Telephone: 973-575-0707  
Facsimile: 973-404-8886  
Email: [hkaplan@rasnj.com](mailto:hkaplan@rasnj.com)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 19(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. **A hearing on the Motion** is scheduled to be held before **Judge Eric L. Frank** on **January 28, 2020, at 9:30am in Courtroom 1, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107**. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Dated: 1/6/2020

**RAS Crane, LLC**  
10700 Abbott's Bridge Rd., Suite 170  
Duluth, GA 30097  
Telephone: 973-575-0707  
Facsimile: 973-404-8886  
By: /s/ Harold N. Kaplan  
Harold N. Kaplan, Esquire  
Bar ID: 38110  
Email: [hkaplan@rasnj.com](mailto:hkaplan@rasnj.com)